Purple

November 9, 2016

VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Notification of Substantive Change, *Structure and Practices of the Video Relay Service Program*, CG Docket No. 10-51; *Telecommunications Relay Service and Speech-to Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123—47 C.F.R § 64.606(f)(2).

Dear Ms. Dortch:

This Notice of Substantive Change is being provided pursuant to 47 CFR §64.606(f)(2) regarding a substantive change in Purple Communications, Inc. ("Purple") services and features.

The Internet of Things (IoT), as believed coined by Kevin Ashton in 1999, can be described as "a system of interrelated computing devices, mechanical and digital machines, objects, animals, or people that are provided with unique identifiers and the ability to transfer data over a network without requiring human-to-human or human-to-computer interaction."[1]

Purple is proud to announce that it is carrying the IoT mantle into the VRS marketplace. On 11/01/2016 Purple launched its new POP™ flasher/call notification system. Purple is the first VRS provider to deliver a flashing call notification system that does not require either a tethered or wireless connection to a customer's specific videophone endpoint. POP takes advantage of the IoT concept by connecting via an encrypted signal directly to the Purple platform. By utilizing this cutting edge technology, the flasher is not dependent on a customer being logged-in to their videophone application in order for the flasther to receive a call notification signal. POP resolves what historically have been some of the more common complaints amongst VRS customers: missing calls due to lack of a quality call notification system and the need to be logged-in to their videophone application/hardware in order for the call notification system to work. POP resolves both of those issues. Additionally, no other VRS provider is currently

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[1] Rouse, Margeret and Wigmore, Ivy (2016, July 13). *Internet of Things (IoT)*, Retreived from http://internetofthingsagenda.techtarget.com/definition/Internet-of-Things-IoT

offering a flasher system that handles call notifications in this manner. Purple believes the launch of POP is in alignment with our CARES commitment of continuing to innovate and drive high-quality products for our consumers.

Additionally, POP will work with the FCC's Accessible Communications for Everyone ("ACE") software client when it eventually becomes available for consumer use.

Purple's new POP product offers the following features:

- POP consists of a light bulb that is paired to Purple's infrastructure via an encrypted connection over the consumer's Wi-Fi network and provides call notification to the consumer when they receive an incoming call.
- POP is a specially-designed light bulb that flashes in five different colors. It will work as a visual notification of an incoming call.
- For individuals who share space with friends or family, each individual can specify their own flashing color (of the five available colors) so they will know who the call is for.
- ACE compatibility

Purple does not expect these changes to affect its compliance with applicable minimum standards.

Respectfully submitted,

PURPLE COMMUNICATIONS, INC.

/s/

Michael Strecker
Vice President of Regulatory and Strategic Policy